



SDMS DocID

2212140

**TRIP REPORT**

**TO:** Robert Crownover, Safety and Quality Manager  
USA Environmental, Inc.

**FROM:** Cheryl M. Riordan, CSP

**SUBJECT:** Safety and Health Audit, MEC Removal Action, Elkton Firehold Site  
Elkton, MD

A safety and health audit was performed by Cheryl M. Riordan, at the MEC Removal Action Elkton Firehole Site in Elkton, MD on October 16, 2007. The purpose of the audit was to review the USA Environmental safety program at this site and to assure compliance with federal, state and local safety and health regulations as well as with the USA Environmental Safety and Health Program, Site Work Plan and Site Accident Prevention Plan/Site Specific Safety and Health Plan.

**Site Personnel Involved:**

Don Garcia, Site Manager, USA Environmental, Inc.  
David Heeks, UXO Safety Officer, USA Environmental, Inc.  
Ann Breslin, US EPA Site Representative  
Jim Crosby, Project Manager, Guardian Environmental Services  
Stephanie Miller, Field Cost Administrator, Guardian Environmental Services

**Paperwork Audited:**

HAZWOPER Training Certificates  
HAZWOPER Physical forms  
EOD Training forms  
First Aid/CPR forms  
Vehicle Inspection forms  
Safety Inspection forms  
Accident Investigation reports  
Safety Logs  
Safety Briefing forms

The records were well organized, detailed, and easy to locate. All of the USA employees on the site had current physicals and current HAZWOPER Training. David keeps meticulous records and pays close attention to details. He stays on top of the condition of all of the vehicles and equipment, as well as the first aid kits and fire extinguishers. He regularly inspects the magazines and inspects the field operations daily.

The morning safety briefing was presented by David Heeks. It was very thorough and was probably one of the more detailed briefings I have witnessed to date.

We went around the site to witness all of the USA Environmental field operations from a safe distance. All personnel were wearing their required PPE and all were following appropriate safe procedures. Operating teams were maintaining at least a 200 foot separation distance. All magnetometer operators went through the geophysical prove-out test pit prior to heading out to their work sites. Level D PPE is worn.

The soil separation operation was especially interesting. Heavy equipment would bring the soils mixed with rocks and debris to the screening areas. Pressurized water washes the soil away, which runs into a collection pond. The rocks, debris, MEC and asbestos containing material are caught by the screens. The Guardian Environmental Services personnel inspect the wet debris for the asbestos containing material. At this point, they have only found small quantities of asbestos containing materials and all have been non-friable such as shingles and tiles. After this, the USA personnel inspect the remaining debris for MEC. MEC that is considered to be hazardous is inspected and placed in a storage magazine awaiting disposal. Munitions debris is inspected and placed in secured storage until it can be sent to a smelting operation at the end of the project. Up to this point, USA has never had to perform a blow in place disposal operation on this site, however they do have the capability should it later be required. Air sampling has been conducted at the site and to this point, they have never had a positive test for asbestos. They have not yet gone into the more heavily contaminated areas where they suspect they would be more likely to contract more asbestos-containing material.

We inspected the two ATF-approved magazines. Guardian Environmental Services keeps the vegetation cleared from around the magazines. The magazines are kept secured. One magazine is for blasting caps and the other is for MEC. The explosives inventory is checked regularly, and all items are accounted for. The MD is kept in drums in another secured location on the site. The magazines had grounding systems in place and were lined with wood. A fire extinguisher was readily available and had a current inspection on it. The two-man rules for entering the magazines were enforced. The MEC magazine had primarily small primer/detonator cups. A study conducted by GES determined that less than 1% of these actually had any energetic material (August 31, 2007). They had been recently inspected by both the ATF and the local Fire Marshall.

The site also has a guard on duty during non-working hours to protect the site from potential vandals and to protect the public from the hazards of the site. There had been an attempted break-in on one of their trailers, but whoever was responsible didn't get away with anything.

As a subcontractor to GES, USA personnel work closely with the personnel from GES. GES provides the heavy equipment and operators and USA provides UXO Technicians to inspect the buckets of dirt and debris for MPPEH. GES runs the soil washdown station and USA provides UXO Technicians to inspect the screens for MPPEH. The two companies coordinate closely with daily operations and they share the morning safety briefing. Another UXO company, Advent, is also operating in separate areas of the site that are not covered by this contract. USA coordinates with Advent on a daily basis to assure that adequate safe separation distances are maintained between the operations and

to assure both companies will be able to operate without negatively impacting the other. Reactives Management performs the QA function for the GES and performs an inspection at least weekly. This coordination will continue to be especially important as they move into the potentially more hazardous areas of the site during the Phase II operations. General air monitoring has been routinely conducted and there have not been any positive results to date. When they proceed to the Phase II operations, which are expected to recover significantly more asbestos-containing material, air monitoring will be stepped up to include some personal air sampling as well as general air sampling.

Instead of digging up all of the anomalies in the more heavily contaminated Phase II section of the work, the EPA is considering capping the burial pits and OB/OD pits and leaving them in place. The final decision on this is still pending.

Due to all of the different parties working on the site at the same time, there could be a potential for safety issues to arise, but due to the proactive approach taken by the management of GES and USA and Advent, all parties have developed good lines of communication and cooperation to assure that they do not impact on each other's operations. There is also good communication with the regulators, so that everyone is aware of what is going on at the site and any concerns are addressed as soon as they arise. This appears to be a very well managed site.

Cheryl M. Riordan, CSP  
Program Occupational Safety Manager  
USA Environmental, Inc.

---